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17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 MATTHEW R. LINDNER, et al.,

Case No. : 2-10-CV-0051-LDG-LRL

20 Plaintiffs,

21 vs.  
22 **DEFENDANT EVENFLO COMPANY  
23 EXHIBIT LIST**

FORD MOTOR COMPANY, et al.,

24 Defendants.  
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1       Defendant **EVENFLO COMPANY, INC.**, by and through their attorneys of record,  
2 hereby serves its exhibit list. Evenflo reserves the right to supplement this exhibit list with  
3 additional exhibits, including exhibits necessary to rebut exhibits listed by Plaintiffs that are  
4 determined to be admissible. For example, Evenflo produced a large number of test reports and  
5 sled test videos on the Embrace car seat. Evenflo reserves the right to seek to introduce selected  
6 copies of the test reports and test videos to respond to Plaintiff's evidence. Additionally, there are  
7 a large number of scene and inspection photos taken by the police and experts in the case. Evenflo  
8 reserves the right to seek to introduce selected photos to respond to the evidence presented by  
9 Plaintiff. Evenflo further reserves the right to use additional documents for impeachment purposes  
10 on cross-examination. Evenflo further reserves the right to use as exhibits admissions contained in  
11 Plaintiffs' pleadings and written discovery responses. Evenflo has filed a motion *in limine* to  
12 exclude incident reports. To the extent Plaintiff is permitted to introduce into evidence incident  
13 reports, Evenflo reserves the right to supplement its exhibit list with additional incident reports.

## LIST OF EXHIBITS

EXHIBIT No.	DESCRIPTION
1.	Selected Accident Scene Photos
2.	Selected Vehicle and car seat inspection photos
3.	Selected Surrogate Testing Photos
4.	Selected Medical Records of Vehicle Occupants
5.	Admissible portions of Autopsy Report of Elsy Lindner
6.	Selected Autopsy Photos of Elsy Lindner
7.	Instructions, Owner's Manual, and Labels for Embrace, EVE 1-22
8.	The Owner Guide for the 1998 Explorer vehicle and the Owner Guide Supplement titled "4-Wheeling With Ford", FMC-LINDNER 000089-318.
9.	CV of Randy Kiser

1	10.	CV of Dr. William W. Van Arsdell
2	11.	CV of Gerald E. Corwin
3	12.	CV of Dr. Robert D. Banks
4	13.	Exemplar Embrace child car seats and carrier.
5	14.	Embrace Child Restraint System and Carrier at issue in case
6	15.	Ford Explorer at issue in the case
7	16.	FMVSS 213 Standards
8	17.	(1986) Kahane, C. "An Evaluation of Child Passenger Safety: the Effectiveness and Benefits of Safety Seats Summary." NHTSA DOT HS 806 889
9	18.	(1986) Kahane, C. "An Evaluation of Child Passenger Safety: the Effectiveness and Benefits of Safety Seats." NHTSA DOT HS 806 890
10	19.	(1988) Partyka, S. "Lives Saved By Child Restraints From 1982 Through 1987." NHTSA DOT HS 807 371.
11	20.	(1996) Hertz, E. "Revised Estimates of Child Restraint Effectiveness." NHTSA.
12	21.	(1999) Office Regulatory Analysis "Final Economic Assessment - FMVSS 213, FMVSS 225." NHTSA Docket No. 98-3390-27.
13	22.	(2001) NHTSA "Fifth / Sixth Report to Congress - Effectiveness of Occupant Report Systems and Their Use." NHTSA DOT HS 809 442.
14	23.	(2002) NPRM - FMVSS 213. 67 FR 21806.
15	24.	(2003) Bedewi, P. et al. "An Investigation of Occupant Injury in Rollover: NASS-CDS Analysis of Injury Severity and Source By Rollover Attributes." ESV 419.
16	25.	(2003) FRM FMVSS 213 - June 24, 2003. 68 FR 37620.
17	26.	(2005) "Traffic Safety Facts: 2004 Data - Children." NHTSA DOT HS 809 906.
18	27.	(2005) Starnes, M. "Lives Saved Calculations for Infants and Toddlers." NHTSA DOT HS 809 778.
19	28.	(2005) Van Arsdell, W. "The Evolution of FMVSS 213: Child Restraint Systems." SAE 2005-01-1840.
20	29.	(2006) Goldwitz, J. et al. "FMVSS Child Occupant Protection Regulations." SAE 2006-01-1138.

1	30.	(2007) "Draft in Process ISO Side Impact for CRS Standard." ISO TC 22/SC 12/WG 1 N 786.
2	31.	(2007) "Research for CRS Side Impact Test Method, Feb 8, 2007." LATCH 3 Public Meeting Takata Presentation.
4	32.	(2007) Johannsen, H. et al. "Review of the Development of the ISO Side Impact 5 Test Procedure for Child Restraint Systems." ESV 07-0241.
6	33.	(2007) Parker, D. et al. "Rollover Severity and Occupant Protection - a Review 7 of NASS/CDS Data." SAE 2007-01-0676.
8	34.	(2008) Louden, A. et al. "NHTSA's Initial Evaluation of Child Side Impact Protection." SAE Govt. Industry Presentation.
9	35.	(2009) "NHTSA Statement on Review of Federal Standards for Child Safety 10 Seats." NHTSA Press Release, NHTSA Web-site.
11	36.	(2009) Louden, A. et al. "NHTSA's Initial Evaluation of Child Side Impact 12 Protection - Update." SAE Govt. Industry Presentation.
13	37.	(2009) Louden, A. et al. "NHTSA's Initial Evaluation of Child Side Impact Test 14 Procedures." ESV 09-0539-O.
15	38.	(2009) Van Arsdell, W. et al. "Effect of Padding on Child Restraint Performance 16 During Side Impact Collisions." SAE 2009-01-1244.
17	39.	(2009) Wang, Z. et al. "Development and Improvement of Q3s – a Three Year 17 Old Child Side Impact Dummy." ESV 09-0358-O.
18	40.	Raphael, Elizabeth <i>et al.</i> , "Physical Evidence Associated with Seatbelt 19 Entanglement During a Collision," SAE International 2007-01-1501
20	41.	Raasch, Christine <i>et al.</i> , "Seat Belt Entanglement in Rollover Accidents: 20 Physical Evidence and Occupant Kinematics," SAE International 2008-01-1237
21	42.	National Child Passenger Safety Certification Training Program Student Manual, 22 April 2007
23	43.	A Look Inside American Family Vehicles: A National Study of 79,000 car 23 seats
24	44.	Car Seats: Information for Families for 2015, <a href="http://healthychildren.org">healthychildren.org</a>
25	45.	Hoffman, Arthur, "Don't Be a Dummy"
26	46.	Carfax report on Ford Explorer
27	47.	Photographs comparing accident scene photo depicting position of carry handle 27 of subject seat to carry handle of exemplar Embrace



1	48.	Photographs of other car seats that experienced severe stress whitening due to a severe accident.
2	49.	Photographs and video demonstrating amount of force to actuate release handle with car seat inverted and body restrained in car seat
3	50.	5/7/2011 E-mail from Larry Lawrence to Arthur Hoffman related to opinions in case (Hoffman Deposition Exhibit 11).
4	51..	Evenflo's Product Integrity Specification, EVE 0111322 – 011343
5	52.	Design Specifications for Embrace, EVE 188-697
6	53.	Selected copies of testing—CALSPAN Inversion Testing, EVE-005970 - 8519
7	54.	Selected copies NHTSA Testing Documentation, EVE 000844-967
8	55.	Selected copies Testing - MGA, EVE 969 – 3793
9	56.	Selected copies Testing – PIQUA, EVE 004085 - 5794
10	57.	Selected copies Testing - CALSPAN, EVE 005970-8519
11	58.	Design FMEA, EVEN 00121-00125
12	59.	Selected sled test videos
13	60.	Demonstrative Chart listing Embrace Test regime
14	61.	Demonstrative Chart listing Dynamic Tests performed on Embrace
15	62.	Exemplar seats and seat belt configuration for Ford Explorer to be used for demonstrative purposes
16	63.	Demonstrative diagrams, models, maps, and illustrations related to accident reconstruction and roll sequence of Ford Explorer.
17	64.	Video of Explorer on slalom course to be used for demonstrative purposes
18	65.	Demonstrative diagrams, models, and illustrations related to the positioning of the bodies and car seat during the accident sequence
19	66.	Demonstrative diagrams, models, and illustrations of injuries to Elsy and Camila Lindner and other vehicle occupants
20	67.	Demonstrative diagrams, models, and illustrations to explain centrifugal forces
21	68.	Any non-objectionable exhibits listed by Plaintiff
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1 DATED this 22nd day of September, 2015.  
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3 /s/ Rosemary Missisian  
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15 *Attorneys for Defendant*  
16 *EVENFLO COMPANY, INC.*  
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## **CERTIFICATE OF SERVICE**

I hereby certify that on the 22 day of September, 2015, a true and correct copy of the foregoing **DEFENDANT EVENFLO COMPANY, INC.'S EXHIBIT LIST** was served by operation of the Court's electronic filing system on counsel of record.

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